Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554 FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)

Administration of the)

North American Numbering Plan)

To: The Commission

CC Docket No. 92-237

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List A B C D E

APPLICATION OF THE ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES FOR MEMBERSHIP ON THE NORTH AMERICAN NUMBERING COUNCIL

Pursuant to the Public Notice released August 9, 1995, in the above proceeding (DA 95-1721), the Association for Local Telecommunications Services ("ALTS") hereby applies for membership on the North American Numbering Council ("NANC").

I. ALTS IS AUTHORIZED TO REPRESENT THE COMPETITIVE LOCAL TELECOMMUNICATIONS INDUSTRY ON THE NANC.

ALTS is the non-profit national trade organization representing competitive providers of local telecommunications services. ALTS' membership includes over thirty non-dominant providers of competitive access and local exchange services which deploy innovative technologies in many metropolitan and suburban areas across the country. ALTS, as well as several of its individual members, participated actively in the Commission proceedings which gave rise to expanded interconnection (Expanded Interconnection with Local Telephone Company Facilities, CC Docket No. 91-141; "Expanded Interconnection"). ALTS also has actively participated in the Commission's docket dealing with No. of Copies rec'd

national numbering policy, <u>Administration of the North American</u>

<u>Numbering Plan</u>, CC Docket No. 92-237, report and order issued

July 13, 1995 ("NANP").

On August 31, 1995, ALTS' Board of Directors adopted a resolution nominating ALTS' President for membership on the NANC (appended as Attachment A). The resolution points out that a competitive industry-wide perspective is needed on the NANC, and that ALTS' president and her appointed representatives will provide that viewpoint along with any individual members of the competitive industry which join the NANC.

II. ALTS' MEMBERSHIP WILL ASSIST THE NANC.

The consensus process mandated by the NANC's charter from the Commission will require that its members reconcile disparate views on numbering policy within each industry segment represented on the Council, while also forging agreement among various member segments and member nations as a whole.

Furthermore, the Commission has determined that "the Council's membership will be impartial and well balanced" (DA 95-1721 at p. 1). Given the immense <u>imbalance</u> that currently exists between monopoly local exchange providers and the competitive industry in terms of revenues, personnel, assets, and sheer weight of numbers, ALTS' presence on the Council is critical to creating some semblance of competitive neutrality.

ALTS is well positioned to assume this task. ALTS is the trade association for the competitive local exchange industry, and has been communicating the industry's views on numbering policy and procedure to the Commission since the commencement of this docket. ALTS already serves on the Network Reliability Council, and is familiar with the demands of multi-segment bodies. Consequently, ALTS is the appropriate representative for the competitive local exchange industry. ALTS hereby commits that its nomineee shall actively participate in good faith in the objectives of the Council.

Requested Information on Nominee

Heather Burnett Gold President, Association for Local Telecommunications Services Representing the competitive local exchange industry

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CONCLUSION

For the foregoing reasons, ALTS requests that it be granted membership on the NANC on behalf of the competitive local exchange industry through its president, Heather B. Gold, and such persons as she may appoint to act on her behalf.

Respectfully submitted,

By: (

Richard J Metzger General Counsel (

Association for Local

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September 8, 1995

RESOLUTION

WHEREAS, prompt and effective implementation of a pro-competitive numbering policy is esssential to the development of robust competition in America's local telecommunications markets;

WHEREAS, pending Federal legislation recognizes the importance of numbering policy in eliminating monopoly control of local telecommunications markets;

WHEREAS, the Federal Communications Commission has issued a Report and Order (CC Docket No. 92-237) creating a North American Numbering Council ("NANC") which is directed to formulate numbering policy "that is impartial and pro-competitive," and to oversee the selection of an administrator of central office code assignments and other on-going numbering responsibilities;

WHEREAS, the FCC has directed that membership on the NANC be "impartial and well balanced," and has requested nominations of parties authorized to represent broad interests;

WHEREAS, the Association for Local Telecommunications Services ("ALTS") is a trade association consisting of competitive providers of local telecommunications services which will be directly affected by the NANC's decisions; and,

WHEREAS, in addition to those individual entities including members of ALTS which may seek to join the NANC and thereby contribute to its mission, it is important that broad industry perspectives as a whole also be represented;

NOW, THEREFORE, be it resolved that the Board of Directors of ALTS hereby nominates the President of the Association, and any person or persons as she may designate to assist her in any fashion, for full membership on the NANC on behalf of ALTS, and hereby authorizes her and any persons she appoints to represent ALTS thereon consistent with all bylaws, resolutions, and specific positions that have been or may be adopted by the Association.

I hereby attest that the above resolution was adopted by ALTS' Board of Directors on August 31,1994.

Wey M. Murphy, Secretary

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Application of the Association for Local Telecommunications Services for Membership on the North American Numbering Council was served September 8, 1995, on the following persons by first-class mail or hand service, as indicated.

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